

Central Valley Regional Water Quality Control Board

27 August 2012

Mr. J. P. Cativiela
Central Valley Dairy Representative Monitoring Program
915 L Street, C-431
Sacramento, CA 95814

CONDITIONAL APPROVAL OF MONITORING AND REPORTING WORKPLAN AND MONITORING WELL INSTALLATION AND SAMPLING PLAN, PHASE 2

The California Regional Water Quality Control Board (Central Valley Region) received the Monitoring and Reporting Workplan and Monitoring Well Installation Sampling Plan, Phase 2 (Phase 2 Workplan) dated 6 June 2012. An addendum to the workplan was received on 6 August 2012. The workplan and addendum describe work to be completed during implementation of Phase 2 of the Central Valley Dairy Representative Monitoring Program (CVDRMP). The CVDRMP is intended to comply with Monitoring and Reporting Program (MRP) R5-2007-0035, revised on 23 February 2011, allows dairies regulated under Waste Discharge Requirements General Order for Existing Milk Cow Dairies, Order R5-2007-0035 (Dairy General Order) to conduct representative monitoring in lieu of individual groundwater monitoring at each dairy.

As part of our approval process, the workplan was sent to interested parties and placed on our website for 30-day public review and comment. The comment period ended on 23 July 2012 and one comment letter from Western United Dairymen was received. The addendum was deemed to contain details on the sites to be monitored and did not propose significant changes. It was decided that additional public comment was not warranted.

The Phase 2 Workplan and addendum propose utilizing existing groundwater monitoring wells and/or installing new groundwater monitoring wells on 26 dairies within the San Joaquin and Sacramento Valleys. This is in addition to wells installed on 18 dairies during Phase 1. Field procedures are proposed to be similar to that utilized during Phase 1 of the program with the following exceptions:

1. The borehole for the installation of nested wells will have a diameter of nominally 12 inches or more to allow for 2 inches of separation between the well casings and the borehole wall;
2. Discrete soil samples will be obtained with a split-spoon sampler every five feet unless adverse soil conditions are encountered; and
3. Well development shall aim to produce water free of sand with a turbidity less than 50 nephelometric turbidity units.

While the workplan and addendum provide information on the facilities to be monitored and how data will be collected, a discussion of how the selected sites are representative of dairies that are not being monitored is not included. This information is critical to demonstrating how information collected from the monitored dairies will be extrapolated to dairies not monitored and identify whether improvements in management practices are needed to protect groundwater quality.

After reviewing the workplan, addendum, and the comment letter received, the Phase 2 Workplan and Addendum is approved provided the conditions listed below are met.

1. The monitoring wells are installed **by 31 December 2012**.
2. The proposed sampling locations are incorporated into the monitoring program beginning with the **first quarter 2013**.
3. The Monitoring Well Installation Completion Report must be submitted **within 45 days** of completion of field activities.
4. By **15 May 2013**, submit a report describing how the monitored dairies (Phase 1 and Phase 2) are representative of dairies covered by this program. In addition, the report must describe any gaps in the monitoring program that could impair the ability to identify whether the combination of management practices and site conditions are protective of groundwater quality (i.e., do additional representative dairies need to be added to the monitoring program). If data gaps are identified and monitoring at additional representative dairies is needed, this report must contain a workplan that addresses deficiencies in the program.

The Executive Officer has authority pursuant to California Water Code Section 13267 to require additional technical information and may require such information of any participating dairy.

If you have any questions regarding this matter, please contact Clay Rodgers at (559) 445-5102 or crodgers@waterboards.ca.gov.



for Pamela C. Creedon
Executive Officer

cc: Luhdorff and Scalmanini Consulting Engineers, Woodland